

### REMARKS

This application has been carefully reviewed in light of the Office Action dated November 8, 2007. Claims 1, 4-7 and 9 are now presented for examination, of which Claims 1, 7 and 9 are in independent form, and have been amended to define still more clearly what Applicant regard as his invention. Claim 2 has been canceled without prejudice or disclaimer of subject matter, and will not be mentioned further.

Claims 1, 4-7 and 9 were rejected under 35 U.S.C. § 103(a) as being obvious from U.S. Patent Application Publication 2002/0097456 (Yamada et al.) in view of U.S. Patent 6,057,933 (Hudson et al.).

As explained in the specification,<sup>1/</sup>

Independent Claim 1 is directed to an image processing method comprising the steps of inputting image data representing an image, where the image data include a plurality of color components, and deciding output data of a plurality of color components, which represent an image reproduced by an output device. According to Claim 1, the deciding step is performed by referring to a table in which a correspondence between input data and a plurality of output patterns is stored. The input data used to access the table is generated by adding data distributed based upon a color difference to the image data of the plurality of color components, and the color difference is generated by calculating the difference between the input data and the plurality of output patterns. The method also comprises outputting the output data of the plurality of color components decided in the deciding step. Also, according to Claim 1, the output data is decided from candidates of a

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<sup>1/</sup> It is of course to be understood that the claim scope is not limited by the details of this or any other particular embodiment that may be referred to.

plurality of output patterns which are respective combinations of the plurality of color components based upon the color difference, and combinations in which cyan and magenta are simultaneously used have been excluded from the candidates in high-contrast areas.

At least one notable feature of this method that is believed not to be taught or suggested by the prior art, is that the output data is decided from candidates of a plurality of output patterns which are respective combinations of the plurality of color components based upon a color difference, and the combinations in which cyan and magenta are simultaneously used have been excluded from the candidates in high-contrast areas. By virtue of this feature, it is possible to process a high-quality image at high speed with an optimum dot configuration in accordance with image data including a plurality of color components representing an input image.

The *Yamada* system decides output cyan C and output magenta M by comparing the sum ( $C_t + M_t$ ) of  $C_t$ , obtained by adding the thresholding error  $C_{err}$  to input cyan C, and  $M_t$ , obtained by adding the error  $M_{err}$  to input magenta M, as shown in Fig.

15. According to *Yamada*, there is outputted either the output cyan C or the output magenta M, as shown in areas (b), (c), (d) and (f) of Fig. 15.

Applicant submits, however, that nothing in *Yamada* would in any way suggest the deciding step recited in Claim 1, in which “deciding output data of a plurality of color components, which represent an image reproduced by an output device, by referring to a table in which a correspondence between input data and a plurality of output patterns is stored, based upon the input data, wherein the input data is generated by adding data distributed based upon color difference to the image data of the plurality of color components, and the color difference is generated by calculating the difference between the

input data and the plurality of output patterns”. Moreover, nothing in that document is believed to teach or suggest a system in which “the output data is decided from candidates of a plurality of output patterns which are respective combinations of the plurality of color components based upon the color difference”, or one in which “the combinations in which cyan and magenta are simultaneously used have been excluded from the candidates in high-contrast area”, as recited in Claim 1.

Accordingly, Applicant believes strongly that Claim 1 is allowable over *Yamada*, taken alone.

Moreover, even if *Hudson* is deemed to show converting C, M and Y values to a base output level using a look-up table, in Fig. 3, step 4, and Fig. 5, Applicant submits that nothing in that patent would suffice to supply what is missing from *Yamada* as a reference against Claim 1. Therefore, Claim 1 is believed to be allowable over *Yamada* and *Hudson*, taken separately or in any permissible combination (if any).

Independent Claims 7 and 9 are apparatus and computer-readable medium claims, respectively, corresponding to method Claim 1, and are believed to be patentable for at least the same reasons as discussed above in connection with Claim 1.

A review of the other art of record has failed to reveal anything which, in Applicant’s opinion, would remedy the deficiencies of the art discussed above, as references against the independent claims herein. Those claims are therefore believed patentable over the art of record.

The other claims in this application are each dependent from Claim 1, and are therefore believed patentable for the same reasons. Since each dependent claim is also

deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

In view of the foregoing amendments and remarks, Applicant respectfully requests favorable reconsideration and early passage to issue of the present application.

Applicant's undersigned attorney may be reached in our New York office by telephone at (212) 218-2100. All correspondence should continue to be directed to our below listed address.

Respectfully submitted,

/Leonard P Diana/

Leonard P. Diana  
Attorney for Applicant  
Registration No. 29,296

FITZPATRICK, CELLA, HARPER & SCINTO  
30 Rockefeller Plaza  
New York, New York 10112-3801  
Facsimile: (212) 218-2200